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Attorneys for Defendant  
STEPHAN EVANOVICH

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	) Case No. 2:24-CR-079-TLN
	)
Plaintiff,	) <b>JOINT STIPULATION AND ORDER TO</b>
	) <b>CONTINUE STATUS CONFERENCE AND</b>
vs.	) <b>EXCLUDE TIME</b>
	)
STEPHAN EVANOVICH,	)
TREVOR FOUNTAIN, &	) Date: April 10, 2025
JONATHAN CURL	) Time: 9:30 A.M.
	) Judge: Hon. Troy L. Nunley, Chief District Judge
Defendants.	)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Jessica Delaney, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Mr. Evanovich; Trevor Fountain, through counsel Toni White; and Jonathan Curl, through counsel Kellan Patterson, that the status conference, currently set for April 10, 2025, **may be continued to June 12, 2025, at 9:30 a.m.** with time between the dates excluded, as detailed below.

The parties stipulate as follows:

1. The indictment in this case was filed on April 04, 2024. Dkt. 1.
2. The Court held a status conference as to Mr. Evanovich, Mr. Curl, and Ms. Carter (the latter of whom has since pled guilty and thus is not a party to this stipulation) on January 23, 2025 and set a further status conference for April 10, 2025. Dkt. 47.
3. Mr. Fountain's initial appearance and arraignment on the indictment was held on

February 20, 2025; Toni White newly entered the case as Mr. Fountain's counsel on that date. Dkt. 51.

4. The government has produced over 14,000 items of discovery.

5. Defense counsel represent that they require additional time to review the discovery; investigate the case; conduct legal research; consult with their clients; explore potential resolutions; and otherwise prepare for trial. They believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

6. The government does not object to the continuance.

7. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and the defendants in a speedy trial, and respectfully request the Court so to find.

8. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (the Speedy Trial Act), the parties request that the time period between April 10, 2025 and June 12, 2025 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T-4), because it would result from a continuance granted by the Court at the defenses' request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and the defendants in a speedy trial.

The parties therefore respectfully request this Court to adopt the parties' stipulation as its Order.

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Respectfully submitted,

HEATHER E. WILLIAMS  
Federal Defender

Date: April 7, 2025

/s/ Christina Sinha  
Assistant Federal Defender  
Attorneys for Defendant  
STEPHAN EVANOVICH

Date: April 7, 2025

/s/ Toni White  
Attorney for Defendant  
TREVOR FOUNTAIN

Date: April 7, 2025

/s/ Kellan Patterson  
Attorney for Defendant  
JONATHAN CURL

Date: April 7, 2025

MICHELE BECKWITH  
Acting United States Attorney

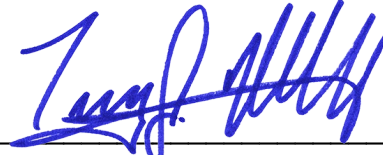
/s/ Jessica Delaney  
Assistant United States Attorney  
Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 7, 2025



Troy L. Nunley  
Chief United States District Judge